Message

From: Vater, Katherine [KVater@trccompanies.com]

Sent: 5/16/2019 3:33:31 PM

To: Ramanauskas, Peter [ramanauskas.peter@epa.gov]

CC: michael.schmoller@wisconsin.gov; Stehn, Andrew [AStehn@trccompanies.com]; Matt Sill [msill@madison-

kipp.com]; Mark Sheppard [msheppard@madison-kipp.com]

Subject: RE: Madison-Kipp - Concrete repair work

Attachments: 40187464_frc.pdf

Peter -

We mobilized to MKC on Friday 5/10/2019 to collect two additional composite concrete samples from the roll offs. Currently there are two roll off containers with concrete from the facility floor.

The first roll off container was filled half way up across the entire foot print of the container. The container was broken up into 8 sections, and a piece of concrete was collected from each section. Each piece of concrete was drilled into and the cuttings were composited for one sample (Sample ID: RO-1C). The sample was analyzed for PCBs using EPA Method 8082 and results reported 3.12 mg/kg for total PCBs.

The second roll off was filled half way up across ¾ of the foot print. The container was broken up into 6 sections, and a piece of concrete was collected from each section. Each piece of concrete was drilled into and the cuttings were composited for one sample (Sample ID: RO-2C). The sample was analyzed for PCBs using EPA Method 8082 and results reported 0.714 mg/kg for total PCBs.

Please let me know if this is okay to dispose of as remediation waste with concentrations of PCBs < 50 mg/kg.

Thanks, Katherine

608-826-3663

From: Ramanauskas, Peter <ramanauskas.peter@epa.gov>

Sent: Thursday, May 9, 2019 11:56 AM

To: Vater, Katherine < KVater@trccompanies.com>

Cc: michael.schmoller@wisconsin.gov; Stehn, Andrew <AStehn@trccompanies.com>; Matt Sill <msill@madison-

kipp.com>; Mark Sheppard <msheppard@madison-kipp.com>

Subject: RE: Madison-Kipp - Concrete repair work

Thanks, Katherine. Please collect a composite sample from both dumpsters.

Peter

From: Vater, Katherine <KVater@trccompanies.com>

Sent: Thursday, May 09, 2019 11:21 AM

To: Ramanauskas, Peter < ramanauskas.peter@epa.gov>

Cc: michael.schmoller@wisconsin.gov; Stehn, Andrew <AStehn@trccompanies.com>; Matt Sill <msill@madison-

kipp.com>; Mark Sheppard <msheppard@madison-kipp.com>

Subject: RE: Madison-Kipp - Concrete repair work

No additional waste characterization sampling is needed by Covanta. The concrete has been mixed and then divided into two dumpsters, so it is not possible to tell which dumpster the concrete from CS-3 is in.

Please let us know if you require an additional sample, and how you would want it to be collected (one or both dumpsters, composite sample or grab sample, etc.).

Thanks, Katherine

608-826-3663

From: Ramanauskas, Peter <ramanauskas.peter@epa.gov>

Sent: Thursday, May 9, 2019 10:00 AM

To: Vater, Katherine <KVater@trccompanies.com>

Cc: michael.schmoller@wisconsin.gov; Stehn, Andrew <AStehn@trccompanies.com>; Matt Sill <msill@madison-

kipp.com>; Mark Sheppard < msheppard@madison-kipp.com>

Subject: RE: Madison-Kipp - Concrete repair work

Does Covanta require any additional waste characterization sampling? If you know that the concrete associated with the CS-3 sample is in one of the roll-off containers, you can collect a representative sample from that roll-off container as an additional check.

If you chose to composite, you can compare the composite sample result to the 50 mg/kg criterion divided by the composite subsample sample size as an adjustment.

Thanks, Peter

From: Vater, Katherine < KVater@trccompanies.com>

Sent: Thursday, May 09, 2019 9:03 AM

To: Ramanauskas, Peter < ramanauskas.peter@epa.gov >

Cc: michael.schmoller@wisconsin.gov; Stehn, Andrew <AStehn@trccompanies.com>; Matt Sill <msill@madison-

kipp.com>; Mark Sheppard <msheppard@madison-kipp.com>

Subject: RE: Madison-Kipp - Concrete repair work

Peter – We do not have the ability to look at any of the subsamples from CS-3. All the concrete is now loaded into two roll-off containers. Is there some other samples that should be collected to re-check if there are any higher concentrations?

Thanks, Katherine

608-826-3663

From: Ramanauskas, Peter < ramanauskas.peter@epa.gov>

Sent: Wednesday, May 8, 2019 4:25 PM

To: Vater, Katherine <KVater@trccompanies.com>

Cc: michael.schmoller@wisconsin.gov; Stehn, Andrew <AStehn@trccompanies.com>; Matt Sill <msill@madison-

kipp.com>; Mark Sheppard <msheppard@madison-kipp.com>

Subject: RE: Madison-Kipp - Concrete repair work

Hello Katherine,

Thanks for the information. From what you've provided, my understanding is this was maintenance or renovation work with the PCB related scope being only to characterize the area of concrete removed for the purposes of off-site disposal.

As you noted, the maximum detection in a 9-point composite sample was 14.9 mg/kg at CS-3. To provide additional assurance that you are properly disposing of the concrete represented by this sample (i.e. none of the individual subsamples exceeded 50 mg/kg and resulted in the 14.9 mg/kg composite result when combined with the other subsamples), do you still have the ability to analyze the individual C-1 through C-9 subsamples?

Thanks, Peter

From: Vater, Katherine <KVater@trccompanies.com>

Sent: Wednesday, May 08, 2019 10:21 AM

To: Ramanauskas, Peter < ramanauskas.peter@epa.gov >

Cc: michael.schmoller@wisconsin.gov; Stehn, Andrew < AStehn@trccompanies.com >; Matt Sill < msill@madison-

kipp.com>; Mark Sheppard <msheppard@madison-kipp.com>

Subject: FW: Madison-Kipp - Concrete repair work

Peter -

WDNR was notified on March 27, 2019 of planned concrete removal work at the Madison-Kipp facility at 201 Waubesa St. We followed the previous protocol for notifications of work on the cap within the building by notifying WDNR. This email is to serve as notice to EPA of the work for a self-implementing on-site cleanup and disposal of PCB remediation waste.

Prior to removal of the concrete, sampling was conducted to characterize the PCB concentration, if any, in the concrete. Six composite samples were collected on March 29, 2019 based on the footprint of the removal area (see the attached field notes from the March sampling). The current status of the project is that the concrete has been removed from the area shown on the attached figure and new concrete has been poured. The old concrete is currently stored in covered roll-off containers for disposal, pending approval from the disposal facility.

Attached are the analytical results from pre-removal sampling to characterize the concrete. PCBs are present in the concrete at concentrations between 0.779 and 14.9 mg/kg. These will be disposed of by Covanta Environmental Solutions and disposal documentation will be provided.

Please let us know if anything further is required for EPA approval of this work so that we can move forward with the disposal. In the future and consistent with the Coordinated Approval, we will notify both EPA and WDNR of planned cap repairs for maintenance of the facility floor.

Thanks, Katherine

608-826-3663

From: Vater, Katherine

Sent: Wednesday, March 27, 2019 12:02 PM

To: Schmoller, Michael R - DNR < Michael.Schmoller@wisconsin.gov>

Cc: Stehn, Andrew <<u>AStehn@trcsolutions.com</u>> **Subject:** RE: Madison-Kipp - Concrete repair work

Mike – Attached is an old figure from Arcadis. The yellow highlighted area is the work that is being done now.

Thanks, Katherine

608-826-3663

From: Schmoller, Michael R - DNR < Michael. Schmoller@wisconsin.gov>

Sent: Wednesday, March 27, 2019 11:03 AM To: Vater, Katherine <KVater@trcsolutions.com> Subject: RE: Madison-Kipp - Concrete repair work

Katherine

Can you provide a map as to where this will take place?

Mike

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

R. Michael Schmoller Phone: 608-275-3303

Michael.schmoller@wisconsin.gov

From: Vater, Katherine <KVater@trcsolutions.com>

Sent: Wednesday, March 27, 2019 10:32 AM

To: Schmoller, Michael R - DNR < Michael. Schmoller@wisconsin.gov>

Cc: Stehn, Andrew < AStehn@trcsolutions.com> Subject: Madison-Kipp - Concrete repair work

Mike,

Mike,

Madison Kipp Corporation will be completing some concrete improvement work at their 201 Waubesa Street Facility. An approximately 9'x53' section of concrete will be removed and replaced. TRC will collect samples of the concrete for laboratory analyses of PCBs and TCLP metals as previously completed at the facility. Sampling is anticipated to be completed tomorrow, 3/28. No underlying soils are expected to be removed from the area. MKC will work with Covanta to dispose of the concrete once removed and the disposal facility will depend on the analytical results. A summary letter will be provided following the completion of the work and will include the location of improvements, sample analytical results, and disposal information. Please let us know if you need any additional information.

Thanks. Katherine

Katherine Vater, PE (WI) Project Manager



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Please note that our domain name and email addresses have changed (kvater@trccompanies.com).